REMARKS/ARGUMENTS

Claims 1-15, 17 and 18 now stand in the present application, claims 1 and 14 having been amended and new claims 17 and 18 having been added. Reconsideration and favorable action is respectfully requested in view of the above amendments and the following remarks.

In the Office Action, the Examiner has rejected claims 1-5, 7 and 14 under 35 U.S.C. § 102(b) as being anticipated by Miyazaki et al. ("Miyazaki"), has rejected claims 1-4 and 14 under 35 U.S.C. § 102(b) as being anticipated by Fujikura (Japanese Patent Abstract 05015026), and has rejected claims 1-4, 14 and 15 under 35 U.S.C. § 102(b) as being anticipated by Born. In view of the above-described claim amendments, the Examiner's § 102 rejections of the claims are believed to have been overcome as will be described in greater detail below.

The Examiner asserts that the Miyazaki "path-finding element is capable of negotiating a path through an obstruction in the duct." *See,* page 3 of the Office Action. Applicants respectfully disagree. The rigid tube (1) in Miyazaki might be thought to be the equivalent of the sub-duct to be inserted into the pipe (c). As is clearly shown in the drawings, the plug (2) has a rounded end including bores (2a). Its purpose, when fitted to the end of tube (1), is to enable steam entering the tube (1) to be discharged.

The Miyazaki plug is thus not a "path-finding element" since it is not "arranged to negotiate a path through an obstruction in a duct to facilitate insertion of the sub-duct into the duct" as required by claim 1. Contrast this with the functional element (20) of the present application which is indeed arranged to obtain a path through a crowded duct (see 20A, 20B, 20C, 20D in the drawings), to enable the insertion of the sub-duct.

This is logical as there is no obstruction in the pipe (c) of Miyazaki. Miyazaki's tube (1) thus does not need the plug (2) to clear a way for it. In any event the tube, being rigid (see Miyazaki at column 4, line 66) is capable of finding its own way into the pipe: plug (2) does nothing for tube (c) in this regard.

The "travelling device" (3) of Fujikura document similarly travels through a channel which is free from obstruction.

In any event, to more clearly patentably define over the cited art, Applicants have amended the independent claims so that they now include the aspect of being capable of being selectively activated for purposes of path negotiation through an obstacle. Support for these amendments is can be found at, inter alia, page 4, line 18 onwards of the present specification where it is stated that the head may be pressurised only when an obstruction is encountered; otherwise the head is in an unpressurised state to enable it to sleeve over the cable. The other embodiments of the path-finding head, e.g., the chisel (described on page 5, line 11 onwards of the present specification), are similarly activated only when required to clear an obstacle within the duct. This activation feature is clearly missing from Miyazaki and Fujikura, in addition to the above noted deficiency that the "heads" in these cited references cases are not arranged for path-finding and obstacle-clearance.

In Born, the obstruction (24) identified by the Examiner is one which restricts water flow in a sewer. *See,* Born at column 4, lines 4-22. It is not an obstruction to the insertion of the sub-duct into the duct. Thus, there is no aspect of "path finding" in the nozzle (18) (which is deemed to be equivalent to the path-finding element of the present application). To emphasize this distinction over Born, Applicants have amended the

independent claims to note the nature of the obstruction, i.e., one which affects the insertion of the sub-duct. This is clearly not the case in Born where the purpose of the device is not removal of the obstruction to enable insertion of the push wand (14) into the sewer, but rather simply removal of the obstruction to clean the sewer.

Finally, Applicants have added two new claims 17 and 18, apparatus and method claims respectively, for the aspect of sleeving the sub-duct over a redundant cable to facilitate its removal, the *raison d'etre* of the insertion of the sub-duct in the first place. Support for these additional claims can be found in the present specification at, *inter alia*, page 7, lines 7 to 24.

Therefore, in view of the above amendments and remarks, it is respectfully requested that the application be reconsidered and that all of claims 1-15, 17 and 18, standing in the application, be allowed and that the case be passed to issue. If there are any other issues remaining which the Examiner believes could be resolved through either a supplemental response or an Examiner's amendment, the Examiner is respectfully requested to contact the undersigned at the local telephone exchange indicated below.

Respectfully submitted,

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